

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

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LIBBY WARD

Plaintiff,

v.

No. 05-2523-DV

COMMUNITY ELDERCARE  
SERVICES, LLC,  
d/b/a/ LAUDERDALE COMMUNITY  
LIVING CENTER

Defendants.

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**CONSENT PROTECTIVE ORDER**

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ON THIS DAY CAME on for consideration and entry, the Consent Protective Order of the parties in the above-referenced cause. This Court is of the opinion that said Consent Protective Order should be entered, and it is, therefore:

ORDERED that in the event that any information, including videotapes or documents, which contain confidential or proprietary information, is required to be produced in this lawsuit, that such information shall be designated confidential at the time of its production or at the time it is otherwise revealed to the opposing party, by watermarking with a stamp that indicates the materials are produced pursuant to protective order, and that any information, including documents so designated shall be maintained in the possession of counsel, shall not be copied or otherwise transcribed, and shall be divulged to no person or entity except the attorneys of record, their staff, the court, the

parties, and expert witnesses.

All such documents and materials produced by Defendant to counsel for Plaintiff shall be used only in the course of the above-captioned proceedings.

It is further:

ORDERED, that within ten (10) days after final termination of this action, any party or other person subject to the terms hereof: (1) shall return to the producing party or non-party all materials and documents produced by that party and designated confidential; and shall (2) return or destroy all other material, memoranda or documents containing confidential information or embodying data concerning confidential information that has been produced by Defendant to the Plaintiff.

**By approval of this protective order, counsel for the Plaintiff agrees to be bound by the conditions of this protective order.**

This Court shall have and maintain jurisdiction over this agreement and/or any breach thereof.

SIGNED this the 12<sup>th</sup> day of January, 2006.

s/ Bernice Bouie Donald

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BERNICE B. DONALD  
UNITED STATES DISTRICT JUDGE

BY CONSENT, APPROVED AS TO FORM  
AND SUBSTANCE:

ATTORNEYS FOR DEFENDANT:

ROSSIE, LUCKETT & RIDDER, P.C.

s/ Lorrie K. Ridder  
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